UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS	
ABDULRAHMAN ALHARBI,)))
Plaintiff,)
-v GLENN BECK; THE BLAZE, INC.; MERCURY RADIO ARTS, INC.; AND PREMIERE RADIO NETWORKS, INC., Defendants.) CIVIL ACTION NO. 1:14-cv-11550-PBS

DEFENDANTS' MOTION TO CERTIFY INTERLOCUTORY APPEAL

Pursuant to 28 U.S.C. § 1292(b), Defendants Glenn Beck, TheBlaze Inc. (erroneously sued herein as "The Blaze, Inc."), Mercury Radio Arts, Inc., and Premiere Networks, Inc. ("Defendants"), hereby move for certification of this Court's Memorandum and Order dated August 9, 2016 [Dkt. No. 133] ("Order") for interlocutory appeal. In support of this Motion, Defendants respectfully refer the Court to their Memorandum of Law in Support of Defendants' Motion to Certify Interlocutory Appeal which is being filed simultaneously herewith and is incorporated herein by reference.

WHEREFORE, Defendants respectfully request that the Court certify the Order for interlocutory appeal under 28 U.S.C. § 1292(b).

Respectfully submitted,

Dated: September 2, 2016 GREENBERG TRAURIG, LLP

By: /s/ Zachary C. Kleinsasser

Michael J. Grygiel (admitted pro hac vice) Zachary C. Kleinsasser (BBO# 664291)

One International Place Boston, Massachusetts 02110

Tel: (617) 310-6000 Fax: (617) 897-0993 grygielm@gtlaw.com kleinsasserz@gtlaw.com

Attorneys for Defendants Glenn Beck, TheBlaze Inc., Mercury Radio Arts, Inc. and Premiere Networks, Inc.

LOCAL RULE 7.1 CERTIFICATION

I, Zachary C. Kleinsasser, hereby certify that counsel for Defendants met and conferred with counsel for Plaintiff, and that the parties were unable to narrow or resolve the issues presented herein.

/s/ Zachary C. Kleinsasser

CERTIFICATE OF SERVICE

I, Zachary C. Kleinsasser, hereby certify that on September 2, 2016, this document was served upon counsel to Plaintiff in this action.

/s/ Zachary C. Kleinsasser